**From:** Inouye, Laura (ECY)
**Sent:** Monday, July 11, 2011 12:58 PM
**To:** Randall, Loree' (ECY)
**Subject:**

Loree',

Here are my comments for the SAP. Although all these comments are important to address, I've highlighted in red some critical ones that may really cause issues down the line.

- Are locations in both table 2A and 2B being sampled (as implied in the plan)? Or only one of the tables, based on the final design?

- What happens with biological assays if reference fails? Will they revert to comparison to controls?

- Larval assays. It is critical to use the SAME species for all years of the test, or it may be comparing apples and oranges. This need to be stated in the plan- that they will at least do their best to remain consistent.

- Microtox. Last year at SMARM, a presentation was given regarding issues with holding times and microtox. (See attached PDF for the Newfields presentation on the topic) Waiting for chemistry results for this assay may be problemmatic. I strongly suggest they either just run microtox on all samples WITHOUT waiting for chemisty (the price to pay for using a cheap and easy chronic test) or, if they do not want to go that route, they should use one of the chronic bioassays that uses invertebrates- more expensive, needs more sediments, but less impacted by holding times. The second option is the preferred option, but I understand the desire to control costs. I worry that two of the three assays are ones that have "issues"- Microtox has holding time issues, larval assays have intermittent fail issues, especially with reference sediments. (see attached SMARM 2010 presentation ny Newfields)

- Section 5.1.1. second paragraph. How long are organisms being acclimated for? Acclimation mentioned in text, but not how long. Also, section does not mention the use of reference controls.

- Section 6.2.4- comparability. Again, it is critical that larval assays use the same species to the best ability of the labs. Additionally, I have some concerns about the ability to sample in some locations AFTER the project is completed- I note that a few of the samples will be under the structure. This is fine, as long as it doesn't impede the ability to take those samples after project completion. If it is likely that the structure might impede sampling, the sampling location should be moved now, even if it impacts the ability to meet the current DQO's of detecting hotspots- because moving sampling sites around after the initial sampling would have even a larger impact on the ability to monitor potential changes over time.

- They need to include a Table with holding time conditions and limits for sediment samples. Section 6.7.3 mentions 6-month holding time for frozen sediments. There are exceptions (mercury, 28-days; total volatile, 14 days, ammonia, 7 days) and in addition, some analyses should not have their archived aliquot frozen- like conventional, ammonia, TVS, volatile organics, and bioassay sediments. They need to include the table with holding times and holding requirements- under their current proposal, they are improperly archiving sediments for many analyses. The DMMP table on holding times and storage requirements is included for reference.

- Section 6.3, field quality assurance: how are decontamination blanks being collected? Water rinse of the equipment, solvent rinse, wipe tests, etc.?

- Section 10 has what I believe is an error- they say bioassays are being run first, and chemistry may take an additional 12 weeks. The earlier sections indicate this is a tiered approach with chemistry first (which 5 week turnaround is reasonable), with bioassays following (12 weeks is long for that given they have no long-term invertebrate assay, only 10-day amphipod).

Laura